

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS**

## SYMOLOGY INNOVATIONS, LLC

## Plaintiff,

V.

## **MOTOROLA SOLUTIONS, INC.,**

**Defendant.**

**CIVIL ACTION NO. 2:17-cv-00026**

## **JURY TRIAL DEMANDED**

**MOTION TO DISMISS VOLUNTARILY WITHOUT PREJUDICE**

Plaintiff Symbology Innovations LLC (“Symbology”) pursuant to Fed. R. Civ. P. 41 (a), hereby move for an order dismissing all claims by Symbology against Defendant Motorola Solutions, Inc. (“Motorola”) in this action WITHOUT PREJUDICE, with each party to bear its own costs, expenses and attorney’s fees.

Dated: February 28, 2017

Ferraiuoli LLC

/s/*Eugenio J. Torres-Oyola*

Eugenio J. Torres-Oyola

USDC No. 215505

221 Ponce de Leon Ave., 5<sup>th</sup> Fl.

(T) 787.766.7000

(F) 787.766.7001

(E) [etorres@ferraiuoli.com](mailto:etorres@ferraiuoli.com)

*Attorney(s) for Plaintiff  
Symbology Innovations LLC*

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of the above and foregoing document has been served on February 17, 2017, to all counsel of record who are deemed to have consented to electronic service via the Court's CM/ECF system per Local Rule CV-5(a)(3).

*/s/Eugenio J. Torres-Oyola*  
Eugenio J. Torres-Oyola